

Division of Air Quality Permit Application Submittal

Please find attached a permit application for :

[Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only):
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only):

• Type of NSR Application (check all that apply):

- ☐ Construction
- ☒ Modification
- ☐ Class I Administrative Update
- ☐ Class II Administrative Update
- ☐ Relocation
- ☐ Temporary
- ☐ Permit Determination

• Type of 45CSR30 (TITLE V) Application:

- ☐ Title V Initial
- ☐ Title V Renewal
- ☐ Administrative Amendment**
- ☐ Minor Modification**
- ☐ Significant Modification**
- ☐ Off Permit Change

****If the box above is checked, include the Title V revision information as ATTACHMENT S to the combined NSR/Title V application.**

• Payment Type:

- ☒ Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
- ☐ Check (Make checks payable to: WVDEP – Division of Air Quality)

Mail checks to:
WVDEP – DAQ – Permitting
Attn: NSR Permitting Secretary
601 57th Street, SE
Charleston, WV 25304

Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.

• If the permit writer has any questions, please contact (all that apply):

☐ Responsible Official/Authorized Representative

- Name:
- Email:
- Phone Number:

☒ Company Contact

- Name:
- Email:
- Phone Number:

☒ Consultant

- Name:
- Email:
- Phone Number:



global environmental solutions

Weyerhaeuser NR Company

Sutton OSB Mill

Facility ID No. 007-00016

Heaters, West Virginia

Rule 13 / Title V Permit Modification Application

March 2021



Sutton OSB Mill Rule 13 / Title V Permit Modification Application

Prepared for:

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, WV 25301

This document has been prepared by SLR International Corporation. The material and data in this permit application were prepared under the supervision and direction of the undersigned.

A handwritten signature in blue ink that reads "Jesse Hanshaw". The signature is written in a cursive, flowing style.

Jesse Hanshaw, P.E.
Principal Engineer

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Notes:

ATTACHMENT _ – Not applicable – No resulting change


APPLICATION FOR PERMIT

Rule 13 / Title V Permit Modification Application

**Sutton OSB Mill
Heaters, West Virginia**

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021

	<p>WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF AIR QUALITY 601 57th Street, SE Charleston, WV 25304 (304) 926-0475 www.dep.wv.gov/daq</p>	<p>APPLICATION FOR NSR PERMIT AND TITLE V PERMIT REVISION (OPTIONAL)</p>	
<p>PLEASE CHECK ALL THAT APPLY TO NSR (45CSR13) (IF KNOWN):</p> <p><input type="checkbox"/> CONSTRUCTION <input checked="" type="checkbox"/> MODIFICATION <input type="checkbox"/> RELOCATION <input type="checkbox"/> CLASS I ADMINISTRATIVE UPDATE <input type="checkbox"/> TEMPORARY <input type="checkbox"/> CLASS II ADMINISTRATIVE UPDATE <input type="checkbox"/> AFTER-THE-FACT</p>		<p>PLEASE CHECK TYPE OF 45CSR30 (TITLE V) REVISION (IF ANY):</p> <p><input type="checkbox"/> ADMINISTRATIVE AMENDMENT <input type="checkbox"/> MINOR MODIFICATION <input checked="" type="checkbox"/> SIGNIFICANT MODIFICATION</p> <p>IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS ATTACHMENT S TO THIS APPLICATION</p>	
<p>FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.</p>			
<p align="center">Section I. General</p>			
<p>1. Name of applicant (as registered with the WV Secretary of State's Office): Weyerhaeuser NR Company</p>		<p>2. Federal Employer ID No. (FEIN): 263481257</p>	
<p>3. Name of facility (if different from above): Sutton OSB Mill</p>		<p>4. The applicant is the: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH</p>	
<p>5A. Applicant's mailing address: 3601 Gauley Pike Heaters, WV 26627</p>		<p>5B. Facility's present physical address: 3601 Gauley Pike Heaters, WV 26627</p>	
<p>6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>– If YES, provide a copy of the Certificate of Incorporation/Organization/Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A.</p> <p>– If NO, provide a copy of the Certificate of Authority/Authority of L.L.C./Registration (one page) including any name change amendments or other Business Certificate as Attachment A.</p>			
<p>7. If applicant is a subsidiary corporation, please provide the name of parent corporation:</p>			
<p>8. Does the applicant own, lease, have an option to buy or otherwise have control of the <i>proposed site</i>? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>– If YES, please explain: The applicant owns the site.</p> <p>– If NO, you are not eligible for a permit for this source.</p>			
<p>9. Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.): Engineered Wood Products Facility producing Oriented Strand Board (OSB)</p>			<p>10. North American Industry Classification System (NAICS) code for the facility: 321219</p>
<p>11A. DAQ Plant ID No. (for existing facilities only): 007-00016</p>		<p>11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R30-00700016-2018(MM01) R13-1761J</p>	

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

12A.

- For **Modifications, Administrative Updates or Temporary permits** at an existing facility, please provide directions to the *present location* of the facility from the nearest state road;
- For **Construction or Relocation permits**, please provide directions to the *proposed new site location* from the nearest state road. Include a **MAP** as **Attachment B**.

Traveling along I-79, exit at Flatwoods (Exit 67) and navigate towards U.S. Rt 19. Travel North on U.S. Rt. 19 for approximately five (5) miles and the facility will be located on your left

12B. New site address (if applicable):

N/A

12C. Nearest city or town:

Heaters

12D. County:

Braxton

12.E. UTM Northing (KM): 4,290.213

12F. UTM Easting (KM): 529.939

12G. UTM Zone: 17N

13. Briefly describe the proposed change(s) at the facility:

This permit application is being submitted in accordance with CO-R34-E-2020-10 to establish biofilter fan preventative maintenance (PM) inspection and recordkeeping provisions as well as spare replacement fan blade requirements.

14A. Provide the date of anticipated installation or change:

- The replacement fan was installed and allowed the biofilter to restart operations on February 18, 2021.

14B. Date of anticipated Start-Up if a permit is granted:

NA

14C. Provide a **Schedule** of the planned **Installation of/Change** to and **Start-Up** of each of the units proposed in this permit application as **Attachment C** (if more than one unit is involved).

15. Provide maximum projected **Operating Schedule** of activity/activities outlined in this application:

Hours Per Day 24

Days Per Week 7

Weeks Per Year 52

16. Is demolition or physical renovation at an existing facility involved? ☒ **YES** ☐ **NO**

17. **Risk Management Plans.** If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your **Risk Management Plan (RMP)** to U. S. EPA Region III.

18. **Regulatory Discussion.** List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (*if known*). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (*if known*). Provide this information as **Attachment D**.

Section II. Additional attachments and supporting documents.

19. Include a check payable to WVDEP – Division of Air Quality with the appropriate **application fee** (per 45CSR22 and 45CSR13).

20. Include a **Table of Contents** as the first page of your application package.

21. Provide a **Plot Plan**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as **Attachment E** (Refer to **Plot Plan Guidance**) .

- Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).

22. Provide a **Detailed Process Flow Diagram(s)** showing each proposed or modified emissions unit, emission point and control device as **Attachment F**.

23. Provide a **Process Description** as **Attachment G**.

- Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.

– For chemical processes, provide a MSDS for each compound emitted to the air.

25. Fill out the **Emission Units Table** and provide it as **Attachment I**.

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**.

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**.

28. Check all applicable **Emissions Unit Data Sheets** listed below:

- | | | |
|--|--|--|
| <input type="checkbox"/> Bulk Liquid Transfer Operations | <input type="checkbox"/> Haul Road Emissions | <input type="checkbox"/> Quarry |
| <input type="checkbox"/> Chemical Processes | <input type="checkbox"/> Hot Mix Asphalt Plant | <input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities |
| <input type="checkbox"/> Concrete Batch Plant | <input type="checkbox"/> Incinerator | <input type="checkbox"/> Storage Tanks |
| <input type="checkbox"/> Grey Iron and Steel Foundry | <input type="checkbox"/> Indirect Heat Exchanger | |
| <input type="checkbox"/> General Emission Unit, specify: Internal Combustion Engines Data Sheet, Glycol Dehydration Unit Data Sheet | | |

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

- | | | |
|---|---|--|
| <input type="checkbox"/> Absorption Systems | <input type="checkbox"/> Baghouse | <input type="checkbox"/> Flare |
| <input type="checkbox"/> Adsorption Systems | <input type="checkbox"/> Condenser | <input type="checkbox"/> Mechanical Collector |
| <input type="checkbox"/> Afterburner | <input type="checkbox"/> Electrostatic Precipitator | <input type="checkbox"/> Wet Collecting System |

☐ Other Collectors, specify – BioOxidation (Biofilter)

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**.

Ø Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

☐ YES ☒ NO

Ø If **YES**, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's **"Precautionary Notice – Claims of Confidentiality"** guidance found in the **General Instructions** as **Attachment Q**.

Section III. Certification of Information

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

- | | |
|---|---|
| <input checked="" type="checkbox"/> Authority of Corporation or Other Business Entity | <input type="checkbox"/> Authority of Partnership |
| <input type="checkbox"/> Authority of Governmental Agency | <input type="checkbox"/> Authority of Limited Partnership |

Submit completed and signed **Authority Form** as **Attachment R**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

35A. **Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

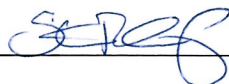
Certification of Truth, Accuracy, and Completeness

I, the undersigned ☐ **Responsible Official** / ☒ **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

Received
March 17, 2021
WV DEP/Div of Air Quality

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE  (Please use blue ink) DATE: 16 March 2021 (Please use blue ink)

35B. Printed name of signee:

Steven Cutlip

35C. Title:

Mill Manager

35D. E-mail:

steve.cutlip@weyerhaeuser.com

36E. Phone:

304-765-4212

36F. FAX

304-765-4280

36A. Printed name of contact person (if different from above): Jesse Hanshaw, P.E.

36B. Title: Principal Engineer,
SLR International Corporation

36C. E-mail: jhanshaw@slrconsulting.com

36D. Phone: 304-545-8563

36E. FAX: 681-205-8969

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Attachment A: Business Certificate | <input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet |
| <input checked="" type="checkbox"/> Attachment B: Map(s) | <input type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s) |
| <input type="checkbox"/> Attachment C: Installation and Start Up Schedule | <input type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s) |
| <input type="checkbox"/> Attachment D: Regulatory Discussion | <input type="checkbox"/> Attachment N: Supporting Emissions Calculations |
| <input checked="" type="checkbox"/> Attachment E: Plot Plan | <input checked="" type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans |
| <input checked="" type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s) | <input checked="" type="checkbox"/> Attachment P: Public Notice |
| <input checked="" type="checkbox"/> Attachment G: Process Description | <input type="checkbox"/> Attachment Q: Business Confidential Claims |
| <input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS) | <input checked="" type="checkbox"/> Attachment R: Authority Forms |
| <input type="checkbox"/> Attachment I: Emission Units Table | <input checked="" type="checkbox"/> Attachment S: Title V Permit Revision Information |
| <input type="checkbox"/> Attachment J: Emission Points Data Summary Sheet | <input checked="" type="checkbox"/> Application Fee |

Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.

FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:

- ☐ Forward 1 copy of the application to the Title V Permitting Group and:
- ☐ For Title V Administrative Amendments:
- ☐ NSR permit writer should notify Title V permit writer of draft permit,
- ☐ For Title V Minor Modifications:
- ☐ Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,
- ☐ NSR permit writer should notify Title V permit writer of draft permit.
- ☐ For Title V Significant Modifications processed in parallel with NSR Permit revision:
- ☐ NSR permit writer should notify a Title V permit writer of draft permit,
- ☐ Public notice should reference both 45CSR13 and Title V permits,
- ☐ EPA has 45 day review period of a draft permit.

ATTACHMENT A

BUSINESS CERTIFICATE

Rule 13 / Title V Permit Modification Application

Sutton OSB Mill
Heaters, West Virginia

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021

Attachment A

State of West Virginia



Certificate

*I, Natalie E. Tennant, Secretary of State of the
State of West Virginia, hereby certify that*

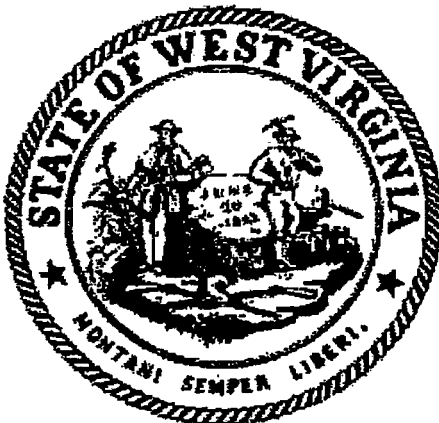
WEYERHAEUSER NR COMPANY

was incorporated under the laws of West Virginia and a Certificate of Incorporation was issued by the West Virginia Secretary of State's Office on October 15, 2008.

I further certify that the corporation has not been revoked by the State of West Virginia nor has the West Virginia Secretary of State issued a Certificate of Dissolution to the corporation.

Accordingly, I hereby issue this

CERTIFICATE OF EXISTENCE



*Given under my hand and the
Great Seal of the State of
West Virginia on this day of
June 23, 2011*

Natalie E. Tennant

Secretary of State

ATTACHMENT B

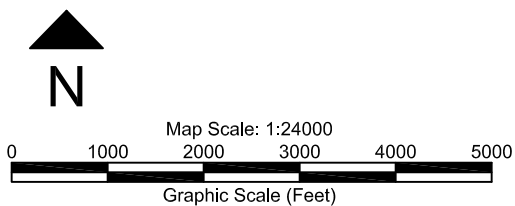
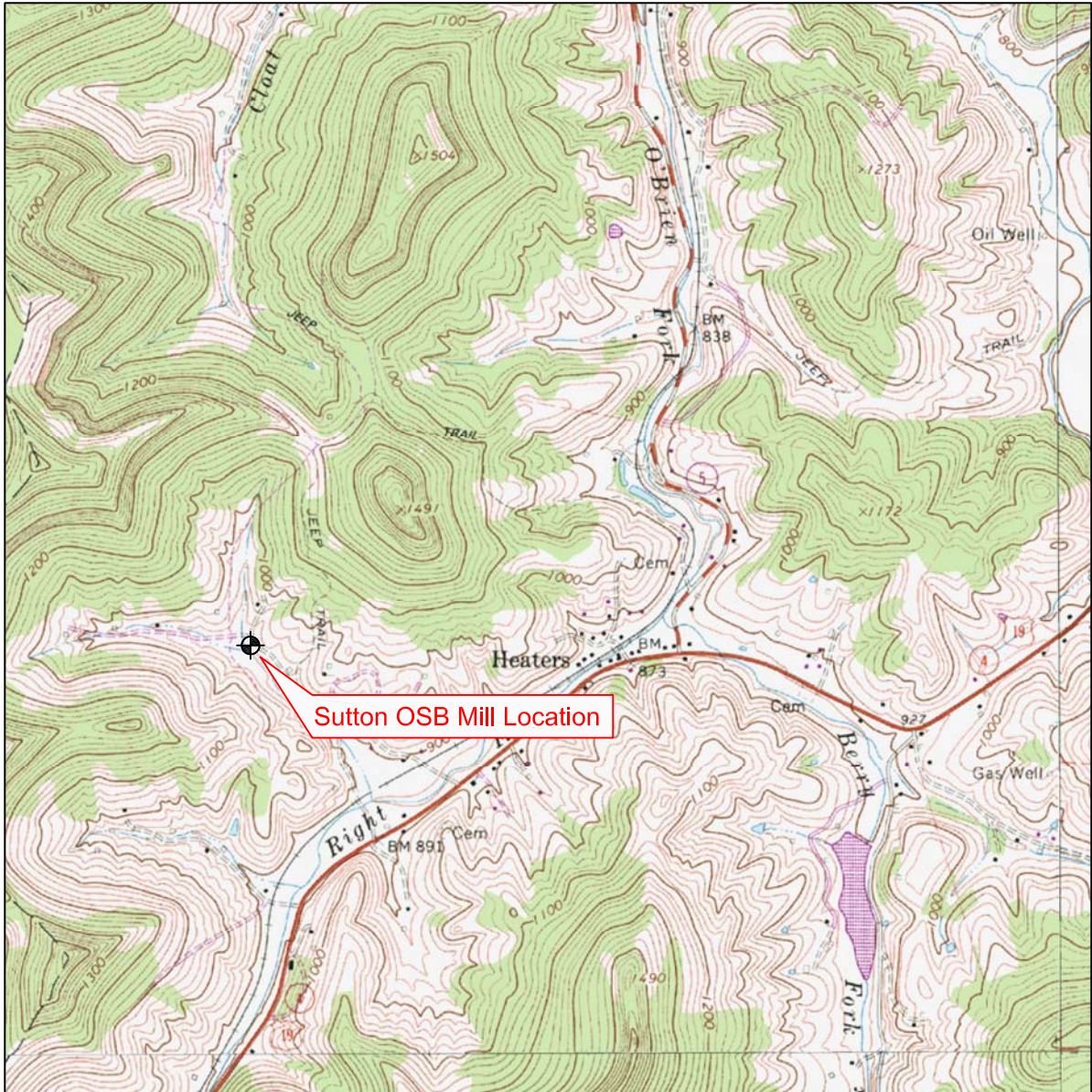
MAP

Rule 13 / Title V Permit Modification Application

**Sutton OSB Mill
Heaters, West Virginia**

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021



Topo map represents a portion of the Burnsville, W.Va. USGS Topographic Quadrangle, 1965 Edition, Photorevised 1989.

GPS Coordinates of Site

Lat: 38.76011° N, Long: -80.65541° W



#8 Capitol Street, Suite 300
Charleston, West Virginia 25301
Tel: 681-205-8949, Fax: 681-205-8969

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

Report:

Rule 13 / Title V Permit Modification Application

Drawing

Attachment B - Map (Topographic)

Date: February 2016

Scale: 1" = 2000'

Fig. No.

Drawn By: CLB

Project #: 116.00687.00030

ATTACHMENT C

INSTALLATION AND START-UP

Not Applicable (N/A)

Rule 13 / Title V Permit Modification Application

**Sutton OSB Mill
Heaters, West Virginia**

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

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ATTACHMENT D

REGULATORY DISCUSSION

Not Applicable (N/A)

Rule 13 / Title V Permit Modification Application

Sutton OSB Mill
Heaters, West Virginia

Weyerhaeuser NR Company
3601 Gauley Turnpike
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ATTACHMENT E

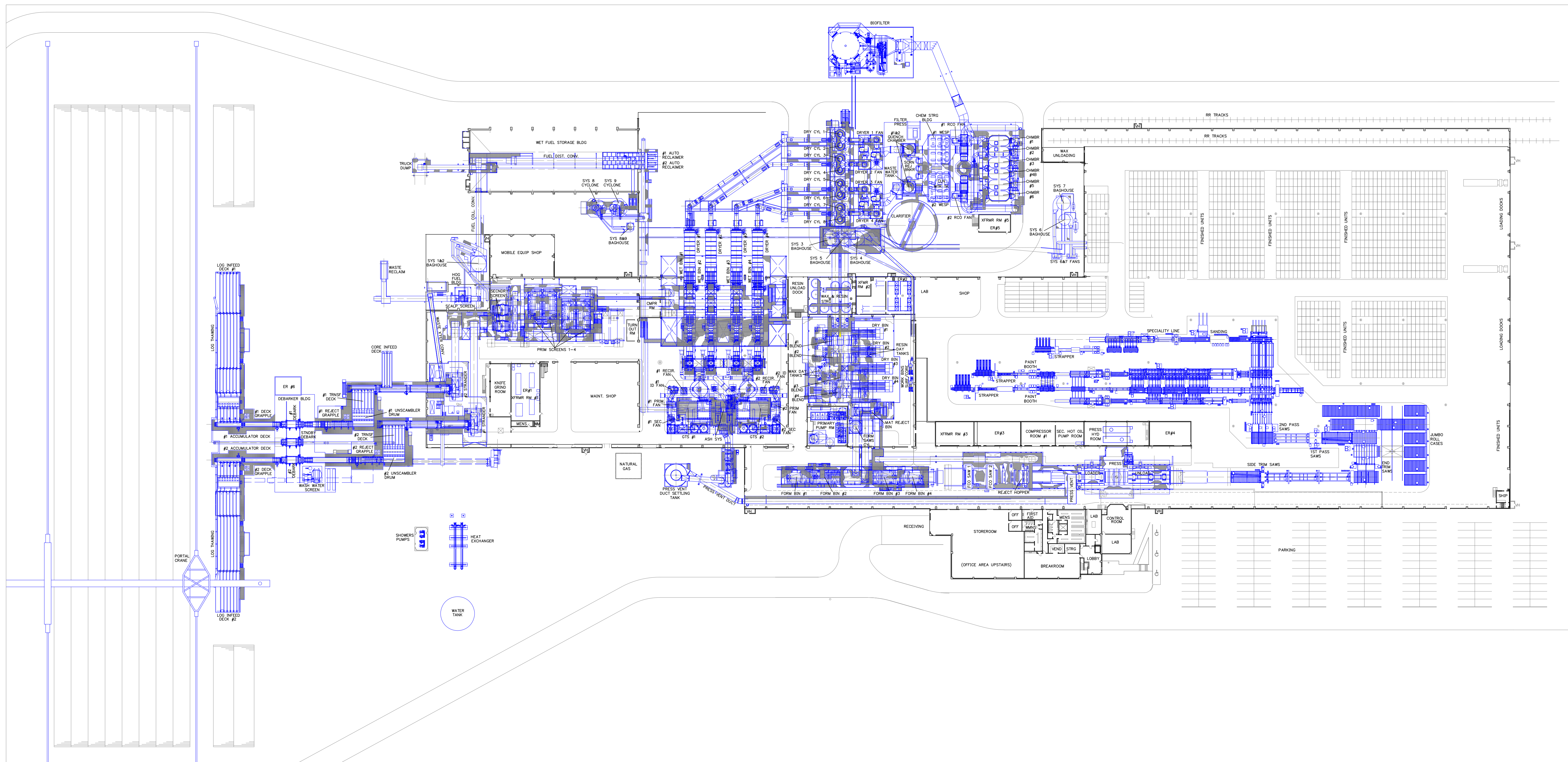
PLOT PLAN

Rule 13 / Title V Permit Modification Application

**Sutton OSB Mill
Heaters, West Virginia**

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

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1	09/14/17	MHR		ADDED BIOFILTER EQUIPMENT
0	12/12/01	BW		RELEASED FOR REVIEW
REV	DATE	BY	APP'D	DESCRIPTION OF REVISION



GENERAL FACILITY EQUIPMENT LAYOUT	
DRAWING NUMBER 800-G-7002-D-02	REV 1

ATTACHMENT F

PROCESS FLOW DIAGRAM

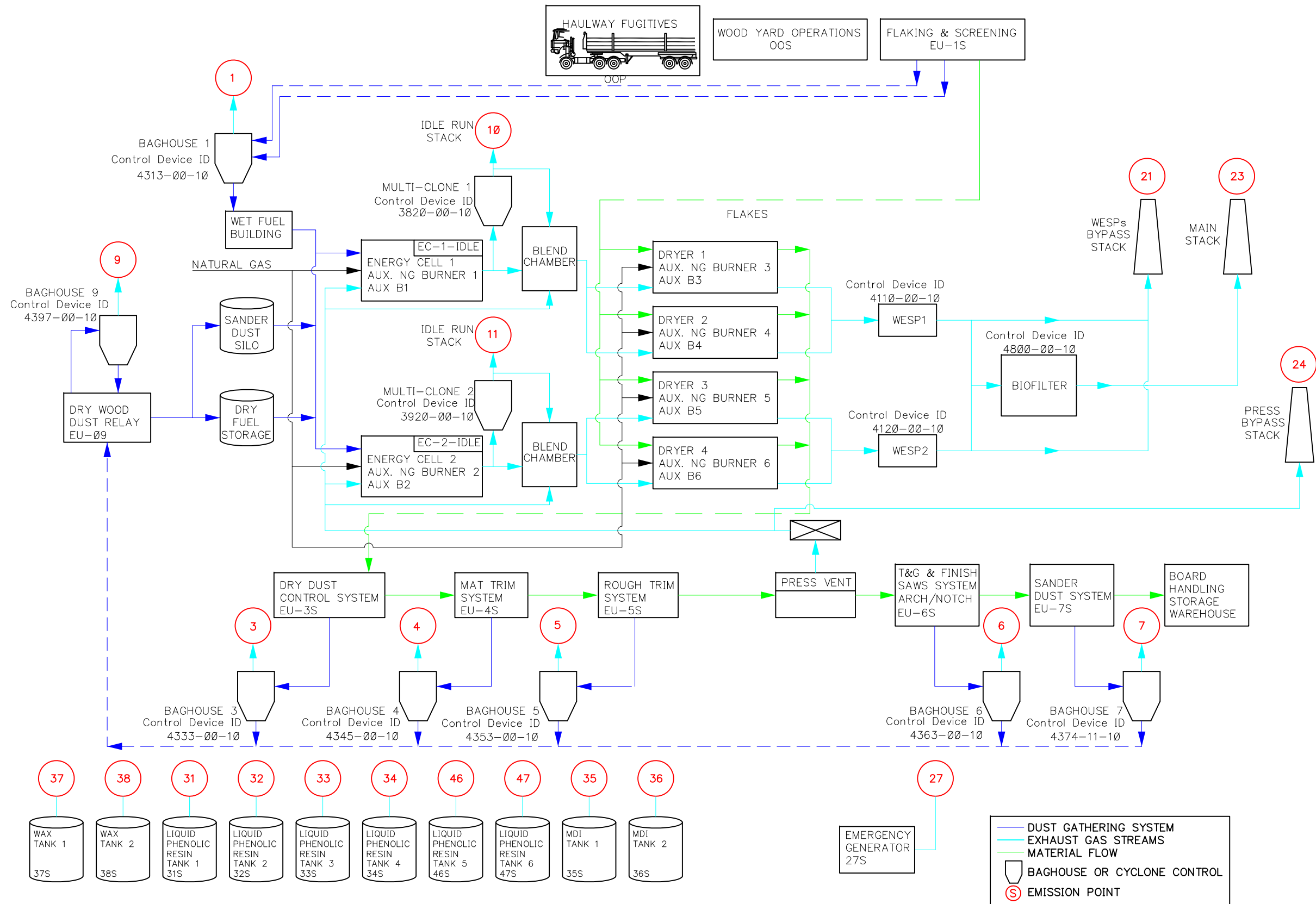
Rule 13 / Title V Permit Modification Application

Sutton OSB Mill
Heaters, West Virginia

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

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ATTACHMENT C -- PROCESS FLOW



NOTES:

- Energy Cell No. 1 Wood dust burner ID. 3800-00-10
Aux. natural gas burner ID. 3816-00-11
- Energy Cell No. 2 Wood dust burner ID. 3900-00-10
Aux. natural gas burner ID. 3916-00-11
- Dryer No. 1 Aux. natural gas burner ID. 3130-00-11
- Dryer No. 2 Aux. natural gas burner ID. 3230-00-11
- Dryer No. 3 Aux. natural gas burner ID. 3330-00-11
- Dryer No. 4 Aux. natural gas burner ID. 3430-00-11
- OSB Press Equipment ID. 4700-00-10

9	9/14/17	MHR	—	REMOVED WAX TANK HEATER	4	1/9/08	DEK	—	ADDED RTOS.
8	2/16/16	MHR	—	REVISED PRESS VENT TO SHOW TO BLEND CHAMBERS	3	2/10/05	DEK	—	ADDED 2 TANKS, REMOVED RCOS.
7	2/8/16	MHR	—	REMOVED RCOS/RTOS & ADDED BIOFILTER W/ NEW STACK	2	5/30/02	BW	—	ADDED BAGHOUSE 3, RENUMBERED OTHERS
6	10/28/11	MHR	—	ADDED BLEND CHAMBERS	1	4/23/02	BW	—	REVISED PRESS VENT BYPASS LINE
5	10/13/11	MHR	—	ADDED ARCH/NOTCH SYSTEM TO BAGHOUSE 6	0	7/16/01	BW	—	ISSUED FOR RECORD
REV	DATE	BY	APPD	REVISION DESCRIPTION	REV	DATE	BY	APPD	REVISION DESCRIPTION



Sutton OSB
Heaters, West Virginia

APPROVED	SCALE	NTS	MO	DAY	YR.
—	DRAWN	B. WICKS	04	23	02
PROJECT	CHK'D	M. RUTHERFORD	09	14	17

PROCESS DIAGRAM FOR WEYERHAEUSER WEST VIRGINIA SUTTON OSB FACILITY	
DRAWING NUMBER	REV 9
800-G-7003-A-02	

ATTACHMENT G

PROCESS DESCRIPTION

Rule 13 / Title V Permit Modification Application

Sutton OSB Mill
Heaters, West Virginia

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021

PROCESS DESCRIPTION

General Overview of Control and History

Following issuance of Permit R13-1761I in August of 2016, Weyerhaeuser executed its plan to upgrade the PWCP MACT HAP control system to incorporate a biological oxidation scrubber, commonly referred to as a biofilter, at the Sutton OSB Mill. The biofilter was installed in the winter of 2016 and replaces the two regenerative catalytic oxidizers (RCOs) as a means of controlling HAPs from the Mill. The two RCOs are no longer in operation and have been disconnected from the Mill's emission control system. After successful demonstration, the biofilter is currently operating as the Mill's primary HAP emission control device.

The biofilter functions as a large scrubber which has three packed bed sections. The scrubbing liquid is water with live bacteria that have been designed to digest water soluble hydrocarbons. They are especially efficient at controlling methanol due to its solubility in water.

On March 30-31, 2017, within 180 days of startup, compliance testing was conducted on the biofilter to demonstrate compliance with Permit R30-00700016-2013(SM01) and establish operating limits. Test results indicated the methanol destruction efficiency, 91.75%, satisfied the methanol emissions removal standards set forth in the permit.

The Rule 13 permit was updated to R13-1761J, October 18, 2018, to completely remove the old RCO units from the facility. Subsequently, the Title V permit was renewed and amended under R30-00700016-2018(MM01).

More Recent Developments

Within a year of being installed, the biofilter's process fan wheel experienced a premature failure of its welds. At that time, a spare fan wheel was available for prompt installation. On September 22, 2020, the replacement fan wheel failed as a result of significant corrosion.

Consistent with DAQ consent order number CO-R34-E-2020-10, Weyerhaeuser installed an upgraded stainless-steel alloy fan wheel, which started up on February 18, 2021, and has provided for specified preventative maintenance inspection requirements. A spare upgraded stainless-steel alloy fan wheel has been ordered to keep on site to offset the lengthy delivery times in the event the fan wheel in use fails or otherwise requires replacement.

This modification to the facility's existing construction and Title V operating permits is part of the compliance plan established by the DAQ order.

ATTACHMENT H

SAFETY DATA SHEETS (SDS)

Not Applicable (N/A)

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Heaters, West Virginia

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ATTACHMENT I

EMISSION UNITS TABLE

Not Applicable (N/A)

Rule 13 / Title V Permit Modification Application

Sutton OSB Mill
Heaters, West Virginia

Weyerhaeuser NR Company
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ATTACHMENT J

EMISSION POINTS DATA SUMMARY SHEET

Not Applicable (N/A)

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**Sutton OSB Mill
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Weyerhaeuser NR Company
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Heaters, West Virginia

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ATTACHMENT K

FUGITIVE EMISSIONS DATA SHEET

Not Applicable (N/A)

Rule 13 / Title V Permit Modification Application

Sutton OSB Mill
Heaters, West Virginia

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021

ATTACHMENT L

EMISSION UNIT DATA SHEET

Not Applicable (N/A)

Rule 13 / Title V Permit Modification Application

Sutton OSB Mill
Heaters, West Virginia

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021

ATTACHMENT M

AIR POLLUTION CONTROL DEVICE DATA SHEET

Rule 13 / Title V Not Applicable (N/A)

Permit Modification Application

**Sutton OSB Mill
Heaters, West Virginia**

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021

ATTACHMENT N

SUPPORTING EMISSIONS CALCULATIONS

Not Applicable (N/A)

Rule 13 / Title V Permit Modification Application

Sutton OSB Mill
Heaters, West Virginia

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021

ATTACHMENT O

**MONITORING/RECORDKEEPING/REPORTING/
TESTING PLANS**

Rule 13 / Title V Permit Modification Application

**Sutton OSB Mill
Heaters, West Virginia**

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021

MONITORING, RECORD KEEPING, REPORTING, TESTING PLANS

In accordance with item 12 in the Order of Compliance section of Consent Order number CO-R34-E-2020-10, the following provisions shall be added to the facility's Rule 13 and Title V permit. *(note: the numbering below corresponds to the items as listed within the Order)*

- 6. The Company shall clean and inspect the biofilter fan quarterly. Inspection shall include non-destructive testing of the fan components. The first such preventive maintenance inspection shall be conducted no later than April 19, 2021.**
- 7. No later than May 19, 2021, the Company shall place an order for a spare biofilter fan made from a corrosion resistant stainless-steel alloy. The spare fan-wheel shall be stored at the Facility and be readily available for installation and operation as soon as possible should the fan fail.**
- 8. The Company shall keep and maintain a spare fan wheel at the Facility at all times unless the previous spare has recently been placed into operation.**
- 9. No later than thirty (30) days after a spare fan wheel for the fan has been placed into operation and no other spare fan-wheel is available on-site, the Company shall do one of the following:**
 - a. Order a new or refurbished fan wheel that can be placed into primary service or maintained at the site as the spare fan wheel; or**
 - b. Initiate repair of the fan-wheel that was taken out of service. Once repaired, it may be returned to primary service or maintained at the site as the spare.**
- 10. Unless requested and granted an extension by the DAQ, the Facility shall not operate more than twelve (12) months after placing a new or spare fan wheel into operation without a spare present at the Facility.**
- 11. The Company shall submit to the DAQ with each of its Semi-Annual Plywood MACT Self-Monitoring Reports a report on the Fan PM events that have been performed since submission of the previous Semi-Annual Plywood MACT Self-Monitoring Report. The Fan PM event report shall include the following:**
 - a. the date for each Fan PM event that occurred, discussion of findings and any performed or anticipated maintenance or repairs, and**
 - b. a copy of each Fan PM form filled out during each Fan PM event.**

ATTACHMENT P

PUBLIC NOTICE

Rule 13 / Title V Permit Modification Application

**Sutton OSB Mill
Heaters, West Virginia**

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021

AIR QUALITY PERMIT NOTICE
Notice of Application

Notice is given that Weyerhaeuser NR Company has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Rule 13/Title V permit modification to the Sutton OSB Facility near Heaters, in Braxton County, West Virginia. The latitude and longitude coordinates are 38.76245 and -80.65324.

The modification will not change the facility's potential to discharge of any Regulated Air Pollutants but will establish additional preventative maintenance procedures as it pertains to the biofilter fan.

Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice. Written comments will also be received via email at DEPAirQualityPermitting@WV.gov.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 41281, during normal business hours.

Dated this the 23rd day of March 2021.

By: Weyerhaeuser NR Company
 Matthew Rutherford
 Environmental Manager
 3601 Gauley Pike
 Heaters, WV 26627

ATTACHMENT Q

CONFIDENTIAL BUSINESS INFORMATION (SEE NOTE)

Not Applicable (N/A)

Rule 13 / Title V Permit Modification Application

**Sutton OSB Mill
Heaters, West Virginia**

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021

ATTACHMENT R

AUTHORITY FORMS

Rule 13 / Title V Permit Modification Application

Sutton OSB Mill
Heaters, West Virginia

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021



west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
(304) 926-0475

Austin Caperton, Cabinet Secretary
dep.wv.gov

May 20, 2020

Alan Sherrington
Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, WV 26627

Re: Delegation of Authority Confirmation
Weyerhaeuser NR Company
Heaters Facility
Facility ID No. 007-00016

Dear Mr. Sherrington:

The Division of Air Quality hereby acknowledges your Delegation of Authority and Responsible Official letter, dated March 2, 2020, designating Steven Cutlip as the authorized representative for Weyerhaeuser NR Company, Heaters facility.

Should you have any questions or comments, please contact our office at the address or telephone number listed above.

Sincerely,

A handwritten signature in blue ink that reads "Laura M. Crowder". The signature is written in a cursive, flowing style.

Laura M. Crowder
Director

LMC/pkk

c: File Room



Sutton OSB
3601 Gauley Turnpike
Heaters, WV 26627
Phone (304) 765-4200
Fax (304) 765-4282

March 2, 2020

Mr. William F. Durham, Director
WV Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

RE: Weyerhaeuser NR Company
Sutton OSB Responsible Official – Facility ID No. 007-00016

Director Durham,

Pursuant to 40 CFR 70.2, 71.2 and 122.22, I would like to advise you that as a responsible official and corporate officer for Weyerhaeuser NR Company, in charge of the principal business function for the Sutton OSB Facility, I am duly authorizing Steven Cutlip, Mill Manager, as the designated representative having signatory authority where such requirement is necessary or in his absence his appointed designee. Mr. Cutlip is responsible for the overall operation of the Facility and in his absence his appointed designee will have overall responsibility for the Facility.

I trust that this meets with your approval. Should you have any questions regarding this matter please contact Mike Wood, the Weyerhaeuser Corporate Environmental Manager, at (501) 624-8569 or Matthew Rutherford, Sutton OSB Site Environmental Manager, at (304) 765-4217.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Sherrington".

Alan Sherrington, Vice President
Panel Manufacturing
Weyerhaeuser NR Company

cc: Steven Cutlip, Weyerhaeuser NR Co. – Sutton OSB Site Mill Manager
Matthew Rutherford, Weyerhaeuser NR Co. – Sutton OSB Site Environmental Manager
Mike Wood, Weyerhaeuser NR Co. – Corporate Environmental Manager



Sutton OSB
3601 Gauley Turnpike
Heaters, WV 26627
Phone (304) 765-4200
Fax (304) 765-4282

March 2, 2020

Associate Director
U.S. Environmental Protection Agency – Region III
Office of Air Enforcement and Compliance Assistance
Mail Code 3AP20
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Weyerhaeuser NR Company
Sutton OSB Responsible Official – Facility ID No. 007-00016

Director,

Pursuant to 40 CFR 70.2, 71.2 and 122.22, I would like to advise you that as a responsible official and corporate officer for Weyerhaeuser NR Company, in charge of the principal business function for the Sutton OSB Facility, I am duly authorizing Steven Cutlip, Mill Manager, as the designated representative having signatory authority where such requirement is necessary or in his absence his appointed designee. Mr. Cutlip is responsible for the overall operation of the Facility and in his absence his appointed designee will have overall responsibility for the Facility.

I trust that this meets with your approval. Should you have any questions regarding this matter please contact Mike Wood, the Weyerhaeuser Corporate Environmental Manager, at (501) 624-8569 or Matthew Rutherford, Sutton OSB Site Environmental Manager, at (304) 765-4217.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Alan Sherrington'.

Alan Sherrington, Vice President
Panel Manufacturing
Weyerhaeuser NR Company

cc: Steven Cutlip, Weyerhaeuser NR Co. – Sutton OSB Site Mill Manager
Matthew Rutherford, Weyerhaeuser NR Co. – Sutton OSB Site Environmental Manager
Mike Wood, Weyerhaeuser NR Co. – Corporate Environmental Manager

ATTACHMENT S

TITLE V REVISION INFORMATION

Rule 13 / Title V Permit Modification Application

**Sutton OSB Mill
Heaters, West Virginia**

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021

Attachment S

Title V Permit Revision Information

1. New Applicable Requirements Summary

Mark all applicable requirements associated with the changes involved with this permit revision:

<input checked="" type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS (Subpart(s) _____)	<input checked="" type="checkbox"/> Section 112(d) MACT standards (Subpart(s) <u>DDDD</u> _____)
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) ⁽¹⁾
<input type="checkbox"/> NO _x Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO _x Budget Trading Program EGUs (45CSR26)

⁽¹⁾ If this box is checked, please include **Compliance Assurance Monitoring (CAM) Form(s)** for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why **Compliance Assurance Monitoring** is not applicable:

2. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

☐ **Permit Shield Requested** *(not applicable to Minor Modifications)*

3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision? ☐ Yes ☒ No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R13-1761J	10-18-2018	
R30-00700016-2018(MM01)	5-7-2019	
CO-R34-E-2020-10	12-4-2020	

5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
	MM/DD/YYYY	
	/ /	
	/ /	

6. Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY
NOx	0
CO	0
VOC	0

7. Certification For Use Of Minor Modification Procedures (<i>Required Only for Minor Modification Requests</i>)	
<i>Note:</i>	<i>This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:</i>
<div style="margin-left: 40px;"> i. Proposed changes do not violate any applicable requirement; ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit; iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis; iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act; v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19; vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification; </div> <p style="margin-top: 20px;">Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.</p>	
<p>Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.</p>	
(Signed): _____ <div style="text-align: center; margin-top: 5px;"><i>(Please use blue ink)</i></div>	Date: _____ / ____ / ____ <div style="text-align: center; margin-top: 5px;"><i>(Please use blue ink)</i></div>
Named (typed): _____	Title: _____

Note: Please check if the following included (if applicable):	
<input type="checkbox"/>	Compliance Assurance Monitoring Form(s)
<input type="checkbox"/>	Suggested Title V Draft Permit Language
<i>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</i>	

ATTACHMENT T

MODIFICATION PERMIT APPLICATION FEE

Rule 13 / Title V Permit Modification Application

**Sutton OSB Mill
Heaters, West Virginia**

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021

SUPPORTING DOCUMENTS

Consent Order and Company Record of Repair and Startup

Rule 13 / Title V Permit Modification Application

**Sutton OSB Mill
Heaters, West Virginia**

Weyerhaeuser NR Company
3601 Gauley Turnpike
Heaters, West Virginia

March 2021



west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304 926 0475 • FAX: 304 926 0479

Austin Caperton, Cabinet Secretary
www.dep.wv.gov

**CONSENT ORDER
ISSUED UNDER THE
AIR POLLUTION CONTROL ACT
WEST VIRGINIA CODE, CHAPTER 22, ARTICLE 5, SECTION 4**

TO: Weyerhaeuser NR Company
Alan Sherrington, Vice President Panels
220 Occidental Avenue South
Seattle WA, 98104

DATE:
ORDER NO.: CO-R34-E-2020-10
FACILITY ID NO.: 007-00016

INTRODUCTION

This Consent Order is issued by the Director of the Division of Air Quality (hereinafter "Director"), under the authority of West Virginia Code, Chapter 22, Article 5, Section 1 et seq. to Weyerhaeuser NR Company (hereinafter "Company").

FINDINGS OF FACT

In support of this Order, the Director hereby finds the following:

1. The Company owns and operates an Oriented Strand Board (OSB) production facility (Facility) located in Heaters, West Virginia.
2. The Facility is subject to the following permits:
 - a. Rule 13 Permit R13-1761J, approved on October 18, 2018, pursuant to WV State Rule 45CSR13, "Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, Permission to Commence Construction, and Procedures for Evaluation".
 - b. Title V Permit R30-00700016-2018 (MM01), approved on May 7, 2019, pursuant to WV State Rule 45CSR30, "Requirements for Operating Permits".

Promoting a healthy environment.

3. Among other equipment, the Facility operates two energy cells, four dryers, and an OSB press. On September 28, 2004, these emission points became affected sources subject to 40 CFR 63, Subpart DDDD, "National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products" (Plywood MACT).
4. On October 17, 2016, the Company began operation of a Biofilter to control methanol, a source emission subject to the Plywood MACT. The Biofilter was a replacement control device for the previously used Regenerative Catalytic Oxidizer.
5. In September 2017, the Main Process Air Fan (Fan), used to exhaust emissions from the Plywood MACT affected sources to the Biofilter, experienced a malfunction with its fan-wheel and was taken out of service. The Fan's original fan-wheel had developed cracks in its turning vanes and was replaced with a spare fan-wheel that had been kept and maintained at the Facility.
6. Following the malfunction and fan-wheel replacement referenced in paragraph 5 above, a new, spare fan-wheel was not acquired and kept available should the Fan experience another fan-wheel failure in the future.
7. On September 22, 2020, West Virginia Division of Air Quality (DAQ) personnel were contacted by the Company to report a malfunction of the Facility's Biofilter control train.
8. As reported by Company personnel during the initial contact on September 22 and through various communications with the DAQ thereafter, the Fan began to experience high levels of vibration and, in caution, was shut down on September 18, 2020. The Company's investigation into the cause of the high levels of vibration, which included inspection by the Fan's manufacturer on September 21, found that the Fan's fan-wheel had corroded in certain areas to the point that the Fan could not be safely restarted.
9. After the Fan shutdown on September 18, the Facility's Plywood MACT affected source emissions were rerouted to exhaust out the old main stack, Emission Point 21 in permits R13-1761J and R30-00700016-2018, until such time as the Fan's corroded fan-wheel could be repaired or replaced and the Fan safely restarted.
10. As referenced in paragraph 6, no spare fan-wheel for the Fan was available to facilitate quick replacement since no new, spare fan-wheel for the Fan had been acquired following the September 2017 Fan malfunction and use of the spare that existed at that time.
11. In permits R13-1761J and R30-00700016-2018, the Facility's permitted emission rates for the Plywood MACT affected source emissions exhausting through the Biofilter are:
 - a. Methanol - 1.05 lbs/hr.
 - b. Total HAP's - 17.01 lbs/hr.
 - c. VOC's - 48.60 lbs/hr.

12. Based on previous stack test data from March 2006 and March 2017, actual Total HAP and VOC emissions are less than permitted rates and actual methanol emissions are greater than permitted rates when Plywood MACT affected source emissions are exhausted through the old main stack rather than routed through the Biofilter control device. Estimated emission rates for the Plywood MACT affected sources without treatment by the Biofilter are:
 - a. Methanol - 5.51 lbs/hr.
 - b. Total HAP's - 11.82 lbs/hr.
 - c. VOC's - 18.49 lbs/hr.
13. To reduce methanol emissions until the Fan can be restarted and the biofilter placed back into service, the Company has proposed to increase the flow rate of water at the cyclonic separators ahead of the Wet ESP's from approximately 1,350 to 1,500 gallons per minute, thereby reducing methanol emissions by a DAQ estimated 0.03 lbs/hr.
14. To minimize emissions due to future Fan malfunctions, the Company has committed to: (1) installing in the Fan a new, corrosion resistant, stainless-steel alloy fan-wheel and purchasing a spare corrosion resistant, stainless-steel alloy fan-wheel for the Fan, and (2) implementing a Preventative Maintenance (PM) plan for the Fan, which includes non-destructive testing to measure metal thickness. A written PM plan was submitted to the DAQ on October 16, 2020.
15. The Company estimates the Biofilter will be returned to normal operation no later than February 19, 2021.

ORDER FOR COMPLIANCE

Now, therefore, in accordance with Chapter 22, Article 5, Section 1 et seq. of the West Virginia Code, it is hereby agreed between the parties, and ORDERED by the Director:

1. The Company shall immediately take all measures to initiate compliance with all terms and conditions of Permits R13-1761J and R30-00700016-2018, and the Plywood MACT.
2. In order to reduce emissions of methanol, the Company shall increase the flow rate of water to the Facility's cyclonic separators ahead of the Wet ESP's to at least 1,500 gallons per minute until such time as the Biofilter is returned to normal service.
3. The Company shall return the Facility's Biofilter control device to normal service as soon as possible but no later than February 19, 2021.
4. Both the newly installed and spare fan-wheels for the Fan shall be made from a corrosion resistant stainless-steel alloy.
5. No later than fifteen (15) days after the effective date of this Order, the Company shall obtain and submit to the DAQ documentation of the materials from which the Fan's new fan-wheel is constructed.

6. Upon restart of the Fan, the Company shall begin following the PM plan referenced in paragraph 14 of the Findings of Fact and shall continue following it thereafter. The first such PM inspection of the Fan shall be conducted no later than sixty (60) days after its restart.
7. No later than thirty (30) days after the Fan's first PM inspection, as specified in paragraph 6 immediately above, the Company will order for the Fan a spare fan-wheel made from a corrosion resistant stainless-steel alloy. Once received, the spare fan-wheel shall be stored at the Facility and be readily available for installation and operation as soon as possible should the Fan experience another fan-wheel failure in the future.
8. The Company shall keep and maintain a spare fan-wheel for the Fan at the Facility at all times unless the spare fan-wheel for the Fan has been recently placed into operation.
9. No later than thirty (30) days after a spare fan-wheel for the Fan has been placed into operation and no other spare fan-wheel for the Fan is available on-site, the Company shall do one of the following:
 - a. Order a new or refurbished fan-wheel for the Fan that can be placed into primary service or maintained at the site as the spare fan-wheel for the Fan; or
 - b. Initiate repair of the Fan's fan-wheel that was taken out of service. Once repaired, it may be returned to primary service or maintained at the site as the Fan's spare fan-wheel.
10. Unless requested and granted an extension by the DAQ, the Facility shall not operate more than twelve (12) months after placing a new or spare fan-wheel for the Fan into operation without a spare fan-wheel for the Fan present at the Facility.
11. Once the Biofilter is returned to normal service, the Company shall thereafter submit to the DAQ with each of its Semi-Annual Plywood MACT Self-Monitoring Reports a report on the Fan PM events that have been performed since submission of the previous Semi-Annual Plywood MACT Self-Monitoring Report. The Fan PM event report shall include, at a minimum, the following: the date for each Fan PM event that occurred, discussion of findings and any performed or anticipated maintenance or repairs, and a copy of each Fan PM form filled out during each Fan PM event.
12. Within thirty (30) days of returning the biofilter to normal service, the Company shall submit an "Application for NSR Permit and Title V Permit Revision" to incorporate requirements from paragraphs 6, 7, 8, 9, 10, and 11 above.
13. The Company agrees to pay a civil administrative penalty of forty-six thousand (\$46,000.00) dollars to resolve the violations described in this Order. Payment shall be made within thirty (30) days after the effective date of this Order. All payments shall be made by check payable to the Air Pollution Education and Environment Fund and shall be sent to the Division of Air Quality, Attention: Laura M. Crowder, Director, 601 57th Street,


SE, Charleston, WV 25304. In addition, if the Company fails to pay the foregoing amount timely or to complete any of the requirements contained in this Order to the satisfaction of the Director or within the time limits set forth herein, the Company agrees to pay a stipulated penalty of one thousand dollars (\$1,000.00) per day to the Air Pollution Education and Environment Fund for each day that the action remains incomplete. The Director shall first notify the Company in writing that the facility is in violation of the terms of conditions of the Order, and the stipulated penalty shall then become immediately due and payable. Payments made pursuant to this paragraph are not tax-deductible expenditures for purposes of State or federal law.

OTHER PROVISIONS

1. The Company hereby waives its right to appeal this Order under the provisions of Chapter 22, Article 5, Section 1 of the Code of West Virginia. Under this Order, the Company agrees to take all actions required by the terms and conditions of this Order and consents to and will not contest the Director's jurisdiction regarding this Order. However, does not admit to any factual and legal determinations made by the Director and reserves all rights and defenses available regarding liability or responsibility in any proceedings regarding other than proceedings, administrative or civil, to enforce this Order.
2. The Director reserves the right to take further action if compliance with the terms and conditions of this Order does not adequately address the violations noted herein and reserves all rights and defenses which he or she may have pursuant to any legal authority, as well as the right to raise, as a basis for supporting such legal authority or defenses, facts other than those contained in the Findings of Fact.
3. If any event occurs which causes delay in the achievement of the requirements of this Order, the Company shall have the burden of proving that the delay was caused by circumstances beyond its reasonable control which could not have been overcome by due diligence (i.e., force majeure). Force majeure shall not include delays caused or contributed to by the lack of sufficient funding. Within three (3) working days after the Company becomes aware of such a delay, notification shall be provided to the Director/Chief Inspector and the Company shall, within ten (10) working days of initial notification, submit a detailed written explanation of the anticipated length and cause of the delay, the measures taken and/or to be taken to prevent or minimize the delay, and a timetable by which the Company intends to implement these measures. If the Director agrees that the delay has been or will be caused by circumstances beyond the reasonable control of (i.e., force majeure), the time for performance hereunder shall be extended for a period of time equal to the delay resulting from such circumstances. A force majeure amendment granted by the Director shall be considered a binding extension of this Order and of the requirements herein. The determination of the Director shall be final and not subject to appeal.
4. Compliance with the terms and conditions of this Order shall not in any way be construed as relieving the Company of the obligation to comply with any applicable law, permit, other order, or any other requirement otherwise applicable. Violations of the terms and

conditions of this Order may subject the Company to additional penalties and injunctive relief in accordance with the applicable law.

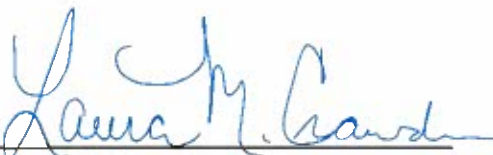
5. The provisions of this Order are severable and should a court or board of competent jurisdiction declare any provisions to be invalid or unenforceable, all other provisions shall remain in full force and effect.
6. This Order is binding on the Company, its successors and assigns.
7. This Order shall terminate upon payment of the civil administrative penalty and completion of all items in the "Order for Compliance" section, including issuance of applicable Rule 13 and Title V permit modifications.



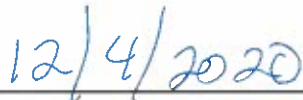
Alan Sherrington, Vice President Panels
Weyerhaeuser NR Company



Date



Laura M. Crowder, Director
Division of Air Quality



Date

Location • Sutton OSB - 3601 Gauley Turnpike, Heaters, WV 26627

Steven R. Cutlip
Mill Manager
Weyerhaeuser Sutton OSB
Phone (304) 765-4212

28 September 2020

Ms. Laura M. Crowder, Director
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Dear Director Crowder,

**Subject: WEYERHAEUSER NR COMPANY
HEATERS, WV – SUTTON OSB FACILITY
R30-00700016-2018
PROCESS AIR FAN**

This letter confirms the event previously reported to Eric Ray of your Department via phone and email. The main process air fan that moves air from the Wet ESP controls at the Weyerhaeuser Sutton OSB facility to the Biofilter control has failed and cannot be repaired. Details are provided in the enclosed document previously emailed to Mr. Ray.

Weyerhaeuser is committed to restoring the Biofilter operation as soon as practically possible and will continue to update DAQ on the timeline for replacing the process air fan. Should you have any questions or comments please contact our facility Environmental Manager, Matthew Rutherford, at 304-765-4217.

Regards,



Steven R. Cutlip
Mill Manager
Weyerhaeuser Sutton OSB

Enclosure(s):
WVDEP DAQ Contact – Process Air Fan Failure

cc: Eric Ray – WVDEP DAQ

Sutton OSB- Process Air Fan

The process air fan moves exhaust gases from the outlet of the WESP to the inlet of the Biofilter

- On Friday, Sept. 18th the process air fan went offline due to high vibration
- The WESP outlets were re-directed to the bypass stack so maintenance could troubleshoot the cause for the high vibration
 - Internal components of the fan were inspected by Weyerhaeuser maintenance personnel in the afternoon of Sept. 18th after sufficient time for the ductwork and fan housing to cool before entry
 - Holes were observed in the outer reinforcement ring near where the turning vanes attach to the fan wheel
 - A company was contracted to clean the fan internals over the weekend so a more thorough inspection could be performed on Monday
- On Monday, Sept. 21st a representative from the fan manufacturer inspected the fan assembly
 - A non-destructive test was conducted to determine current metal thicknesses and loss
 - The inspector determined that the nature and extent of the corrosion in the outer vane support rings precludes safe repair and putting the fan back into service
- The original fan wheel was changed out because of cracks in the turning vanes. These cracks developed from the fan operating at natural frequencies which created harmonics in the wheel. These frequencies were determined before the currently operating fan was put into service and locked out of operating range.
 - Original fan wheel was inspected by the fan manufacturer during their visit to the site on Sept. 21st
 - Wheel was picked up on Sept. 24th for delivery to the OEM's facility in Pittsburgh
 - A timeline is being developed to have this fan wheel cleaned/blasted/repared/coated and then returned to the site – estimated at 3 to 4 weeks
 - It is not certain if this fan wheel can be repaired until the wheel is inspected during the week of Sept. 28th
 - Middle of the week of Sept. 28th more details can be shared on the repairability of the original fan wheel and an ETA to return to the site for installation
 - Install of the wheel can take up to 3 days
 - Current wheel will be removed so the fan housing is ready for a new wheel to minimize time to install
 - As soon as possible, the refurbished fan wheel will be installed and placed in operation if it is repairable
 - In the meantime, the WESP exhaust will continue to exhaust to the bypass stack
- A new style replacement wheel has been on order with an expected delivery in Feb. '21
 - To be constructed out of superalloys for superior corrosion resistance

How do we address the ongoing non-conformance with the PCWP standard? Can we get a variance from control requirements until repairs are made?

Contact with WVDEP:

Initial contact was made by telephone the morning of 09/22/2020 to Richard "Eric" Ray – DEP Air Quality Inspector. Eric has been the inspector for Sutton OSB for many years and is very familiar with the process and operations.

The event for the process fan failure and details below were shared as well as the talking points above:

- Biofilter was put into maintenance mode on 09/18/2020 when the fan went offline due to high vibrations
- System was locked out and an inspection performed by maintenance
 - Multiple holes were identified in the outer support rings with thinning of the metal in surrounding areas
 - Fan was determined not to be safe to operate until further inspection could be conducted by the OEM
- Industrial cleaning company was contracted over the weekend to thoroughly clean the fan wheel for inspection by a representative from the OEM on 09/21/2020
 - After the inspection and continued discussion with the OEM the current fan wheel was determined to be unrepairable and not safe to operate

After this discussion Eric asked for a follow-up e-mail and for any additional details on the event so he could share them with his supervisor. A reply e-mail from Eric was sent later in the day with a list of questions, see attachment:



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Sutton OSB - Biofilter

By EOW on 09/25/2020 the site had not heard anything back from WVDEP, reached out to Eric to see if anything more was needed. He stated his supervisor and director of DAQ were waiting to hear if the original wheel which was returned to the OEM would be repairable to better understand our timeline and if there would be an earlier date than Feb. '21 for the Biofilter to be back online. Let Eric know by the middle of the coming week we would know more about the repairability of the wheel and an expected date for it to return to the site. Asked Eric if a letter should be sent to the director of DEP covering the event, he stated it would be good to send one as a follow-up to the initial notification made by phone and e-mail.